

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

UNITED STATES OF AMERICA

V.

CRIMINAL NO.: 3:17-CR-72-WHB-FKB-2

JAMISON LAYNE TOWNSEND

**SECOND MOTION TO EXTEND DEADLINE TO
SUBMIT EVIDENCE IN MITIGATION**

COMES NOW, the Defendant, Jamison Layne Townsend, by and through her counsel of record and files this her *Motion to Extend Deadline to Submit Evidence in Mitigation*, and in support thereof would show unto the Court the following:

1. On August 29, 2017, this Court ordered defense counsel to submit to the Office of the United States Attorney, Southern District of Mississippi, their evidence to be provided to the United States Department of Justice in an attempt to mitigate against their potential decision to pursue the death penalty against Jamison Layne Townsend. This mitigation information was to be provided on or before February 15, 2018.
2. On January 24, 2018, the co-defendant in this case, Joshua Michael Garcia, filed a *Motion to Extend Deadline to Submit Evidence in Mitigation* in which Ms. Townsend joined. A hearing was held on February 15, 2018, and a new deadline of June 15, 2018, was ordered by the Court.
3. Since the time of the last hearing, issues have arisen during the course of Ms. Townsend's mitigation investigation which warrant the addition of another expert. This expert would be in addition to the mitigation specialist and is required in order to present an accurate and complete picture of Ms. Townsend to the Department of Justice. Funding for this second expert has only been recently approved.
4. Due to the recency of the funding approval and the nature of the expert required, Ms. Townsend would request an additional three months in order to submit her mitigation to the United States Attorney.

5. Thomas Fortner, co-counsel for the co-defendant, Joshua Michael Garcia, has been contacted and has no objection to this extension.
6. Erin Chalk, counsel for the Government, has no objection to this request.
7. Given the nature of this prosecution, and pursuant to 18 U.S.C. § 3161(h)(7)(B)(ii), counsel for Ms. Townsend feels that this request is necessary, and further feels that the ends of justice shall be served by such delay.

WHEREFORE, the Defendant, Jamison Layne Townsend respectfully requests that this Court extend the deadline to submit evidence in mitigation and grant her the relief requested.

This the 28th day of May, 2018.

Respectfully submitted,

By: Dennis Joiner
Federal Public Defender

/s/Michael L. Scott
Michael L. Scott, MB# 101320
Assistant Federal Public Defender
Northern and Southern Districts of Mississippi
200 South Lamar Street, Suite 200-N
Jackson, Mississippi 39201
Telephone: 601-948-4284
Facsimile: 601-948-5510
Email: Mike_Scott@fd.org

Attorney for Defendant

CERTIFICATE OF SERVICE

I, Michael L. Scott, hereby certify that I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all parties of record.

This the 28th day of May, 2018.

/s/Michael L. Scott
Michael L. Scott
Assistant Federal Public Defender